

National Park Service  
US Department of the Interior

Concession Environmental Management Program  
Denver, Colorado



## Guidance for Managing Hazardous Waste





## **Guidance for Managing Hazardous Waste**

**UPDATED: February 2003**

---

The National Park Service Concession Environmental Management Program does not make any guarantee or assume any liability with respect to the use of information in this guidance. It remains the sole responsibility of concessioners to review, understand and apply the appropriate federal, state and local regulations that govern this topic area. Additional consultation with qualified professionals or federal, state and local environmental agencies may be necessary to ensure a concessioner's program complies with applicable regulations.

---

For more information, contact the Concession Environmental Management Program:



*GreenLine* Technical  
Assistance Number  
**303/987-6913**



*GreenLine* Email  
**NPS\_GreenLine@nps.gov**



Concession Environmental Management Program  
Denver, Colorado

## Table of Contents

Purpose of This Guidance .....	4
Who Should Read This Guidance .....	4
What Are Hazardous Wastes? .....	4
Listed Hazardous Wastes .....	4
Characteristic Hazardous Wastes .....	4
Acute Hazardous Wastes .....	5
How Do You Determine if You Generate Hazardous Waste? .....	5
Testing for Hazardous Waste .....	5
Process Knowledge .....	5
Which Hazardous Waste Regulations Affect You? .....	6
Hazardous Waste Management Requirements .....	7
Accumulation Time and Amount Limits .....	7
Satellite Accumulation Area .....	7
Accumulation Area .....	8
Containers .....	8
Labeling .....	9
Recordkeeping .....	9
Best Management Practices Applicable to All Hazardous Waste Generators .....	11
Onsite Treatment Units .....	12
Partnering with Your Park and Household Hazardous Waste Collection Facilities .....	12
Transporting and Accumulating Hazardous Waste .....	13
Recycling and Pollution Prevention .....	14
Do all Hazardous Substances Need to be Managed as Hazardous Waste? .....	14
Additional Information .....	14
<b>TABLE 1: HAZARDOUS WASTE GENERATOR STATUS CATEGORIES .....</b>	<b>6</b>
<b>TABLE 2: SATELLITE ACCUMULATION AREA TIME AND AMOUNT LIMITS .....</b>	<b>8</b>
<b>TABLE 3: ACCUMULATION AREA TIME AND AMOUNT LIMITS .....</b>	<b>8</b>
<b>TABLE 4: HAZARDOUS WASTE MANAGEMENT REQUIREMENTS APPLICABLE TO SMALL QUANTITY GENERATORS (SQG) .....</b>	<b>10</b>
<b>APPENDIX A: FLOWCHART: WHAT IS YOUR HAZARDOUS WASTE GENERATOR STATUS? .....</b>	<b>16</b>
<b>APPENDIX B: FLOWCHART: WHAT IS YOUR HAZARDOUS WASTE GENERATOR STATUS? .....</b>	<b>18</b>
<b>APPENDIX C: MONTHLY HAZARDOUS WASTE GENERATION AND ACCUMULATION TRACKING WORKSHEET AND DIRECTIONS ...</b>	<b>20</b>
<b>APPENDIX D: SAMPLE LABELS .....</b>	<b>22</b>
<b>APPENDIX E: RECORD OF OFFSITE MANAGEMENT OF HAZARDOUS WASTE ...</b>	<b>24</b>

## Purpose of This Guidance

This document provides an overview of the requirements for managing hazardous wastes in accordance with regulations promulgated by the US Environmental Protection Agency (US EPA) in 40 CFR 260 - 299. The guidance concentrates on issues relevant to concessioners operating in National Parks.

## Who Should Read This Guidance

This guidance was written for NPS concessioners that generate any type or amount of hazardous waste.

## What Are Hazardous Wastes?

The Federal government developed hazardous waste regulations to help ensure that these wastes were being properly managed and disposed of in order to minimize environmental contamination.

Hazardous wastes are a subset of solid wastes. A solid waste is any discarded material as defined by 40 CFR 261.2. Solid wastes, as defined by Federal hazardous waste regulations, are not necessarily “solids,” but can also be liquids or gases. Federal regulations define hazardous wastes as solid wastes that are either “listed” or “characteristic” wastes.

**Old, Unused, and Outdated**  
Keep in mind that the US EPA may consider old or outdated hazardous chemicals (e.g., chemicals labeled with the words “CAUTION,” “WARNING,” “DANGER,” “POISON,” or the skull and crossbones symbol, including common household products such as cleaning products, paints, and oils) hazardous “wastes” even though they have not yet been discarded.

### ***Listed Hazardous Wastes***

Listed hazardous wastes are those wastes that are specifically listed under 40 CFR 261, Subpart D. An example of a listed waste is a non-halogenated solvent that will be disposed of (because it is no longer needed or is spent (been used)), such as acetone.

### ***Characteristic Hazardous Wastes***

Characteristic hazardous wastes are any solid wastes that are:

- **Ignitable**; having a flashpoint less than 140 degrees F (e.g., solvent).
- **Corrosive**; having a pH less than 2 or greater than 12.5 (e.g., battery acid has a pH less than 2).
- **Reactive**; unstable under normal conditions (e.g., certain paint strippers).
- **Toxic**; a substance that is harmful or fatal when ingested or absorbed, or leaches toxic chemicals into the soil or ground water when disposed of on land (e.g., wastes that exceed certain concentrations of heavy metals).

These are substances that fail a US EPA test termed the Toxic Characteristic

Leaching Procedure (TCLP) since toxic chemicals leach out in excess of defined levels.

### ***Acute Hazardous Wastes***

Acute hazardous wastes are a subset of hazardous wastes that are fatal to humans in low doses, are capable of causing or significantly contributing to an increase in a serious illness, or (in the absence of data on humans) are fatal to rats or rabbits in low doses. Due to their nature, it is unlikely that any concessioner operations generate such a waste. Therefore, acute hazardous wastes will not be discussed further in this document. If it is determined that your operation **does** generate acute hazardous wastes, contact the NPS *GreenLine* Technical Assistance Number (303/987-6919) for additional guidance.

## **How Do You Determine if You Generate Hazardous Waste?**

Concessioners must be able to demonstrate whether each of their solid waste streams is a hazardous waste. This process is called a “hazardous waste determination.” Hazardous waste determinations can be accomplished by running tests on a solid waste sample, or by using “process knowledge.”

### ***Testing for Hazardous Waste***

There are private firms that specialize in conducting hazardous waste determinations both in the field and in the laboratory – many may be companies that also transport and treat hazardous waste. Some common tests that are conducted on solid wastes to determine if they are hazardous include testing for the pH level, ignitability temperature, and presence of chlorinated chemicals. Another common test is the Toxic Characteristic Leaching Procedure (TCLP), which simulates the conditions found in a landfill. In the TCLP, a somewhat weak acid (e.g., acetic acid) is drawn through a solid waste sample and the resulting liquid is tested for specific levels of contaminants identified by the US EPA (e.g., specific metals and volatile organic compounds); if contaminants are found above a certain threshold, the solid waste is considered a hazardous waste.

### ***Process Knowledge***

Process knowledge means already knowing what is in a solid waste stream, and whether the constituents of that solid waste stream would make the waste hazardous. For example:

- If a food service concessioner knows that **only** food scraps and food packaging materials are thrown out in the trash and placed in the dumpster, and no cleaning chemicals or paints are thrown out in the same trash, the concessioner is using process knowledge if it states that its dumpster contains only nonhazardous solid waste.

- If a service station concessioner knows that used oil was not mixed with any other substances, then the concessioner is using process knowledge if it states that its used oil is nonhazardous.
- If a lodging concessioner reviews the material safety data sheet for a drain cleaner, and it states that the drain cleaner is highly acidic, the concessioner is using process knowledge if it states that the drain cleaner is hazardous waste.

As long as used oil is not mixed with other hazardous wastes, it is exempt from hazardous waste regulations and can follow used oil regulations in 40 CFR 279.

#### Do You Generate Hazardous Waste?

Complete the flowchart in **Appendix A** if you are unsure whether you generate hazardous waste.

Concessioners should maintain documentation that records how the hazardous waste determinations were made (i.e., testing or process knowledge), and the assumptions used to make those determinations. If processes change over time, concessioners need to carry out new hazardous waste determinations and update the documentation on file.

## Which Hazardous Waste Regulations Affect You?

The extent to which hazardous waste regulations apply to your concessioner facilities and operations depends on how much hazardous waste you generate **each calendar month; an average of months may not be used**. (A calendar month means the first day of the month to the last day of the month.) This translates into your business' "hazardous waste generator status." Under Federal regulations, concessioners have the potential to fall into one of three "hazardous waste generator" status categories identified in **Table 1**.

**Table 1: Hazardous Waste Generator Status Categories**

Generator Status	Calendar Monthly Hazardous Waste Generation Limits
Conditionally exempt small quantity generator (CESQG)	220 lbs or less of hazardous waste.
Small quantity generator (SQG)	2,200 lbs or less of hazardous waste.
Large quantity generator (LQG)	More than 2,200 lbs of hazardous waste.

State and/or regulations governing hazardous waste management and storage may be more stringent than Federal regulations. State and/or local environmental regulators should be contacted to verify the applicability of state regulations.

Concessioners should remember that their hazardous waste generator status is determined on a month-by-month basis. If a concessioner is usually a CESQG (i.e., generates 220 lbs or less of

**Unsure of Your Generator Status?**  
Complete the flowchart in **Appendix B** to determine your hazardous waste generator status.

hazardous waste per calendar month) for 11 months out of the year, but generates over 220 lbs of hazardous waste during one month out of the year, the concessioner must meet the SQG hazardous waste management requirements for that month.

## Hazardous Waste Management Requirements

Regulatory requirements vary depending upon the hazardous waste generator status category. Under federal regulations, CESQGs can dispose of their hazardous waste in the regular trash. However, state and local regulations may be more stringent and prohibit this practice.

Concessioners are encouraged to strive to keep their hazardous waste generation rates as low as possible, preferably as a CESQG, if feasible, to help protect the environment. As a recommended Best Management Practice (BMP), the NPS encourages its concessioners who are classified as CESQGs to manage their hazardous waste as SQGs, to help further protection of the environment.



### NPS Policy on Hazardous Waste Management

Currently, it is NPS policy that **all** national parks that generate hazardous waste manage their waste, at minimum, in accordance with the SQG hazardous waste management requirements, irrespective of whether they are classified as SQGs or CESQGs. (LQGs must manage their hazardous waste in accordance with LQG hazardous waste management requirements.)

This NPS policy that requires CESQG national parks to manage all hazardous waste in accordance with the SQG hazardous waste management requirements is not applicable to concessioners unless it is specified in their Concession Contract, Operating and Maintenance Plan, or other concessioner-specific documents. However, it is a recommended Best Management Practice that concessioners who are CESQGs follow the NPS policy of managing hazardous wastes as though they were SQGs.



### ***Accumulation Time and Amount Limits***

Generators are allowed to accumulate hazardous waste on-site without a hazardous waste storage permit as long as they comply with certain management standards. There are two types of areas where concessioners can store their hazardous waste – “satellite accumulation areas” and “accumulation areas.” Each is subject to different hazardous waste accumulation time and amount limits.

#### **Satellite Accumulation Area**

A satellite accumulation area is an area at or near the process that generates the hazardous waste; the area must be under the control of the operator of that process. **Table 2** shows the accumulation time and amount limits for satellite accumulation areas. The on-site amount limit takes into account the **total** of all types of hazardous waste stored in that area, not just the amount of one particular hazardous waste.

**Table 2: Satellite Accumulation Area Time and Amount Limits**

Generator	On-site Accumulation Time Limit	On-Site Amount Limits
LQG or SQG	None	55 gallons
CESQG	None	None

### Accumulation Area

An accumulation area is an area where hazardous waste is stored for eventual disposal. It can take in hazardous waste from satellite accumulation areas. If a container of hazardous waste is taken from a satellite accumulation area to an accumulation area, “the clock starts,” and the hazardous waste must be disposed of within the allowable time for the generator class. If hazardous waste from a satellite accumulation area is added to another container already present in the accumulation area, such as five gallons of used solvent being added to a 250 gallon tank, “the clock starts” when any used solvent was first added to the empty tank. Regardless of when additional waste is poured into the tank, all waste accumulated in the tank must be disposed of within the allowable time based on the start date for the generator class, regardless of whether the container is full.

**Table 3** shows the accumulation time and amount limits for accumulation areas.

**Table 3: Accumulation Area Time and Amount Limits**

Generator	On-site Accumulation Limit	On-Site Quantity Limits
LQG	90 days	No limit
SQG	180 days on-site or 270 days if shipped over 200 miles	13,200 lbs hazardous waste
CESQG	N/A	2,200 lbs hazardous waste

### Containers

For SQGs and LQGs, there are regulatory requirements that govern the containers used to store hazardous waste. For instance, they must be:

- In good condition (waste in a leaking container must be transferred to a container in good condition).
- Compatible with the waste they contain.
- Kept closed during storage, except when adding or removing waste.
- Inspected in the hazardous waste storage areas at least weekly.

Containers must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak. Containers holding ignitable or reactive waste must be located at least 15 meters (approximately 49 feet) from the property line. Incompatible wastes and materials (e.g., wastes and materials that may produce an undesirable chemical reaction, such as an explosion or fire) should not be placed in the same container. Flammable wastes should be stored in flammable material storage cabinets. Finally, hazardous waste should not be placed in an unwashed container that previously held an incompatible waste or material.





It is a recommended BMP for CESQGs to follow the same hazardous waste container requirements as SQGs and LQGs.

### ***Labeling***

SQGs and LQGs must label containers holding hazardous wastes. Labels should read “Hazardous Waste” and include the chemical name or type of hazardous waste (e.g., methylene chloride, mineral spirits, solvent-based parts washer). To help ensure that the waste has not exceeded allowable accumulation time limits, the label should also include the date that hazardous waste was first added to the container. It is recommended BMP that the name of the person responsible for managing the hazardous waste be included on the label.



Refer to **Appendix D** for sample labels in both satellite and non-satellite hazardous waste storage areas.

### ***Recordkeeping***

SQGs and LQGs must complete and use a hazardous waste manifest to ship their waste off-site for disposal/recycling. A signed copy of the manifest must be kept on file for a minimum of 3 years.

CESQGs are not required to use a hazardous waste manifest. However, if CESQG concessioners use a hazardous waste transporter to take their waste, the transporter is required under US EPA regulations to use a hazardous waste manifest.

In addition to manifesting their waste, it is a recommended BMP that concessioners maintain records on how much hazardous waste is generated each calendar month. Using the log in **Appendix C** can assist concessioners in calculating their hazardous waste generator status (i.e., CESQG, SQG, or LQG). This log helps concessioners document their generator status and keep track of where, when, and how hazardous waste was disposed.



#### **Hazardous Waste Manifest**

A hazardous waste manifest is a multi-part form that accompanies and tracks hazardous waste from the point of generation to the point of ultimate treatment, storage, or disposal. Unless the state requires the use of its own manifest form, generators should use US EPA's Uniform Hazardous Waste Manifest (Form 8700-22). Each party involved in the waste's management retains a copy of the manifest (e.g. generator, transporter, facility owner or operator).

#### **What Do I Put on My Manifest for the EPA Generator ID if I am a CESQG?**

SQGs and LQGs are required to obtain an EPA ID number by filing a Notification of Hazardous Waste Activity. CESQGs are not required to submit this form. CESQGs can try to get an EPA ID number from the State regulatory agency but because it is not applicable, this is sometimes difficult and confusing. All CESQGs need to do is write “Conditionally Exempt Small Quality Generator in the space on the manifest.



**Table 4** provides a summary of hazardous waste management requirements applicable to SQGs (a common generator classification and one that includes management requirements that are recommended BMPs even for CESQGs).

**Table 4: Hazardous Waste Management Requirements Applicable to Small Quantity Generators (SQG)**

ISSUE	REQUIREMENT
Notification	<ul style="list-style-type: none"><li>• Notify US EPA of hazardous waste management activities and obtain an EPA ID number.</li></ul>
Container Management	<ul style="list-style-type: none"><li>• Containers storing hazardous waste must be:<ul style="list-style-type: none"><li>• In good condition; waste in a leaking container must be transferred to a container in good condition.</li><li>• Compatible with the waste they contain.</li><li>• Kept closed during storage, except when adding or removing waste.</li><li>• Inspected in the hazardous waste storage areas at least weekly.</li></ul></li><li>• Containers must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.</li><li>• Containers holding ignitable or reactive waste must be located at least 15 meters (approximately 49 feet) from the property line; aisles between the containers should be clear.</li><li>• Incompatible wastes and materials should not be placed in the same container.</li><li>• Hazardous waste should not be placed in an unwashed container that previously held an incompatible waste or material.</li></ul>
Labeling/ Marking	<ul style="list-style-type: none"><li>• Clearly label hazardous waste containers with the words “Hazardous Waste” and the type of waste.</li><li>• Clearly label hazardous waste containers with accumulation start dates. (See <b>Appendix D</b> for a more detailed discussion on labeling.)</li></ul>
Accumulation Limits	<ul style="list-style-type: none"><li>• Accumulate no more than 13,200 lbs of hazardous waste onsite during any one time.</li><li>• Ensure that any single container of hazardous waste does not accumulate for longer than 180 days (or 270 days, if the hazardous waste is shipped more than 200 miles away).</li></ul>
Satellite Accumulation	<p>May accumulate up to 55 gallons of hazardous waste (total of all hazardous wastes (such as solvent A and solvent B), not just one hazardous waste stream at a satellite accumulation area) at or near the point of generation as long as:</p> <ul style="list-style-type: none"><li>• The waste is under the control of the person operating the process that generates the waste;</li><li>• Incompatible wastes are not mixed in the container(s);</li><li>• The container(s) remains closed except when being filled and is marked either with the words “Hazardous Waste” or other words that identify the contents; and</li><li>• The hazardous waste is dated and moved to the designated hazardous waste storage area within 3 days once the satellite container(s) 55 gallon limit is reached.</li></ul>
Employee Training	<ul style="list-style-type: none"><li>• Provide basic training to employees to ensure they are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.</li></ul>
Recordkeeping	<ul style="list-style-type: none"><li>• Complete and sign hazardous waste manifest prior to shipping hazardous waste offsite.</li><li>• Ensure that signed copies of the hazardous waste manifests are received from the initial transporter and from the designated transfer, storage, and/or disposal facility (TSDF) within 60 days; otherwise, notify the US EPA Regional Administrator that the signed copy was not received.</li><li>• Keep copies of signed manifests on file for at least three years.</li></ul>

ISSUE	REQUIREMENT
Disposal	<ul style="list-style-type: none"> <li>Use a transfer, storage, and/or disposal facility (TSDF) that is permitted to handle hazardous waste.</li> </ul>
Emergency Planning	<ul style="list-style-type: none"> <li>Have at least one employee on call with the responsibility for coordinating emergency response related to hazardous waste management.</li> <li>Ensure that all employees are familiar with proper waste handling and emergency procedures relevant to their responsibilities.</li> </ul> <p>Post the following next to the telephone:</p> <ul style="list-style-type: none"> <li>Name and telephone number of emergency coordinators</li> <li>Location of fire extinguishers, spill control materials, and (if present) fire alarm</li> <li>Telephone number of fire department.</li> </ul>



\*It is recommended that concessioners categorized as CESQGs follow SQG requirements as a Best Management Practice.

## Best Management Practices Applicable to All Hazardous Waste Generators



To further protect environmental and human health, the NPS suggests that all concessioners adopt the following recommendations when managing hazardous waste:

- Ensure internal communications equipment is available at the central accumulation area.
- Ensure secondary containment is provided in accumulation areas.
- Ensure floor drains are covered where hazardous wastes are accumulated to prevent accidental hazardous waste spills and releases from entering the sewer or septic system.
- Ensure that fire control equipment is available close to where the hazardous waste is accumulated.
- Ensure decontamination equipment (e.g., emergency showers, eyewashes) are available close to where hazardous waste is accumulated.
- Ensure that heavy hazardous waste containers are stored on the bottom shelves, and smaller, lighter containers are stored on the top shelves.
- Ensure that incompatible hazardous wastes are not stored together.
- Ensure shelving for hazardous waste is strong enough to support the loads placed on them.
- Ensure that the contents of a hazardous waste container are always known by keeping the information from original product labels (e.g., original labels accompanying an unused solvent) with the hazardous waste (e.g., spent solvent). It is best to label the hazardous waste container with its exact contents (e.g., type of spent solvent). Otherwise, it can be extremely costly to dispose of hazardous waste when its contents are “unknown.”

## Onsite Treatment Units

Concessioners may decrease the volume of hazardous wastes disposed of offsite if they use special onsite units, such as antifreeze recycling machines, biofilter degreasing systems, and aerosol can emptying systems. Concessioners should ensure that they are operating these units in accordance with manufacturer's instructions, and that the state they operate in allows this type of activity to occur. In addition, concessioners should remember that filters from these systems contain concentrated wastes that may be considered hazardous waste. For example:

- Antifreeze recycling filters commonly fail TCLP tests since they accumulate many heavy metals.
- Biofilters may be hazardous waste if the filter is not replaced in accordance with the manufacturer's suggested schedule. Concessioners are still encouraged to conduct a hazardous waste determination on at least one biofilter before disposal so that they have their own process knowledge that the biofilter is or is not hazardous waste.

### Watch Out! Hazardous Waste Treatment is not Allowed

The US EPA classifies fluorescent bulb crushing as on-site "hazardous waste treatment" and prohibits fluorescent bulb crushing unless the facility has a hazardous waste treatment permit.

Some states have classified aerosol can emptying systems as hazardous waste treatment, and also prohibit their use unless the facility has a hazardous waste treatment permit.

Concessioners must check with their state environmental agencies to verify what type of "treatment" is permitted for hazardous waste generators without a treatment permit.

## Partnering with Your Park and Household Hazardous Waste Collection Facilities

If the **cogenerator** of hazardous waste status (i.e., two or more entities share the responsibility for managing a particular hazardous waste) is permitted by your state environmental regulatory agency and you are a **cogenerator**, it is a recommended Best Management Practice that you document your responsibilities (e.g., who signs and maintains the hazardous waste manifest?).



Concessioners may generate such minor amounts of waste that contracting directly with a hazardous waste disposal contractor is not cost-effective. These concessioners may have opportunities to partner with the park to dispose of their hazardous waste, or dispose of their hazardous waste at a local household hazardous waste collection program run by a government, university, or environmental organization.

If the concessioner partners with the park to dispose of hazardous waste, the concessioner and park should confirm with the state regulatory agency that it is acceptable for the park to take the concessioner's hazardous waste. (In some

jurisdictions, the park could be classified as a storage facility and be subject to additional, more stringent regulations).



If the concessioner participates in a household hazardous waste collection program, it should verify and maintain documentation on file that the program accepts waste generated on NPS property and from commercial businesses. If the household hazardous waste collection program cannot provide a receipt, it is a recommended BMP that the concessioner maintain an internal record that indicates the type and weight of hazardous waste given to the household hazardous waste collection program and the location and date the hazardous waste was delivered. A sample “memo to file” that may serve as a method for documenting where, when, and the weight of hazardous wastes recycled or disposed of is provided in **Appendix E**.

## Transporting and Accumulating Hazardous Waste

Concessioners that are SQGs and LQGs can transport hazardous waste through the park or along the park boundaries for the purpose of moving it to a centralized accumulation point. However, if the hazardous waste is transported off the property (e.g., to an out-of-park concessioner facility, such as a warehouse), an accurate hazardous waste manifest must be prepared and signed, and the transporter must meet hazardous waste transporter requirements in 40 CFR 263 and hazardous materials transporter requirements from the Department of Transportation. CESQGs are not subject to these requirements.

### Transporting Waste Safely

Even if a concessioner is a CESQG, it should take precautions when transporting hazardous waste. The hazardous waste containers should be labeled, no more than 55-gallons should be transported at a time, secondary containment should be provided, and containers should be secured during transport.

It is also a good idea to material safety data sheets (MSDSs) and spill cleanup materials on hand – but the drivers should be properly trained on how to respond to potential hazardous waste spills (e.g., clean spills up themselves or call for help).



According to federal interpretation, concessioners can use a state road within the park to transport hazardous waste inside park boundaries for the purpose of moving it to a centralized accumulation point without preparing a hazardous waste manifest and meeting hazardous waste transporter requirements in 40 CFR 263. However, concessioners should check with their state environmental regulatory agencies to ensure this is an accepted practice.

Consolidating hazardous wastes from concessioner park operations at an out-of-park facility may be prohibited or subject the concessioner to additional regulatory requirements as a storage facility. Concessioners should verify with their state regulatory agency whether the practice is allowable and what regulatory requirements might apply for the accumulation facility.

## Recycling and Pollution Prevention



The US EPA and NPS strongly encourage all businesses to recycle hazardous waste. As a recommended Best Management Practice, concessioners should find vendors that will recycle their hazardous waste. Common hazardous wastes that can be recycled are waste parts cleaning solvents and paints.

Concessioners must remember unless hazardous waste is recycled **on-site**, the hazardous waste still counts towards calculating the concessioner's hazardous waste generator status each month.

Ultimately, the best practice is to avoid generating hazardous waste in the first place by substituting environmentally preferable alternatives for conventionally used hazardous substances, or changing operations so that hazardous wastes are not generated.

### Does Recycled Hazardous Waste Count Toward My Generator Status?

Hazardous wastes shipped off-site for recycling still count toward the concessioner's hazardous waste generator status. Only hazardous wastes recycled on-site do not need to be counted.

## Do all Hazardous Substances Need to be Managed as Hazardous Waste?

Various maintenance wastes commonly generated at concessioner facilities can be managed under US EPA regulatory programs that have less stringent requirements than hazardous waste management requirements. For example:

- Used oil and used oil filters can be managed under 40 CFR 279.
- Lead-acid batteries can be managed under 40 CFR 266.
- Mercury-containing lamps (e.g., fluorescents), nickel-cadmium and small sealed lead-acid batteries, mercury-containing thermostats, and pesticides can be managed as "universal waste" under 40 CFR 273.

The "Additional Information" section below has more information on universal wastes.

## Additional Information

Resource	Name	Description	Source
document on website	Little Known But Allowable Ways to Deal with Hazardous Waste	Includes regulatory information and a list of state hazardous waste contacts	US EPA (Document 233-B-00-002) <a href="http://www.smallbiz-enviroweb.org/html/pdf/HazWaste_500.pdf">www.smallbiz-enviroweb.org/html/pdf/HazWaste_500.pdf</a>
document on website	RCRA Orientation Manual	Provides introductory information on the solid and hazardous waste management programs under the Resource Conservation and Recovery Act (RCRA)	US EPA (Document EPA530-R-02-016) <a href="http://www.epa.gov/epaoswer/general/orientat">www.epa.gov/epaoswer/general/orientat</a>

Resource	Name	Description	Source
phone number	RCRA, Superfund & EPCRA Call Center	Provides up-to-date information on the Resource Conservation and Recovery Act (RCRA), including hazardous waste, among other environmental areas.	US EPA 1-800-424-9346
website	Wastes	US EPA website that has information on RCRA, including hazardous waste	US EPA <a href="http://www.epa.gov/epaoswer/osw/index.htm">www.epa.gov/epaoswer/osw/index.htm</a>
document	EnviroCheck Sheet: Hazardous Waste Management	Multi-page document used as a tool during NPS environmental audits	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
document	EnviroFacts Sheets: <ul style="list-style-type: none"> <li>• RCRA Generator Status Determination and Requirements</li> <li>• RCRA Waste Characterization</li> <li>• RCRA Recordkeeping</li> <li>• Choosing a Waste Disposal Facility</li> <li>• RCRA Contingency Planning</li> <li>• RCRA/OSHA Preparedness and Prevention</li> </ul>	Two-page documents used by staff not specialized in environmental issues to learn about hazardous waste management	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
document	Guidance for Managing Universal Waste	Guidance for understanding the Universal Waste Rule. Some hazardous wastes, called universal wastes (i.e., fluorescent bulbs, pesticides, mercury thermostats, some batteries), are subject to less stringent regulatory standards.	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913



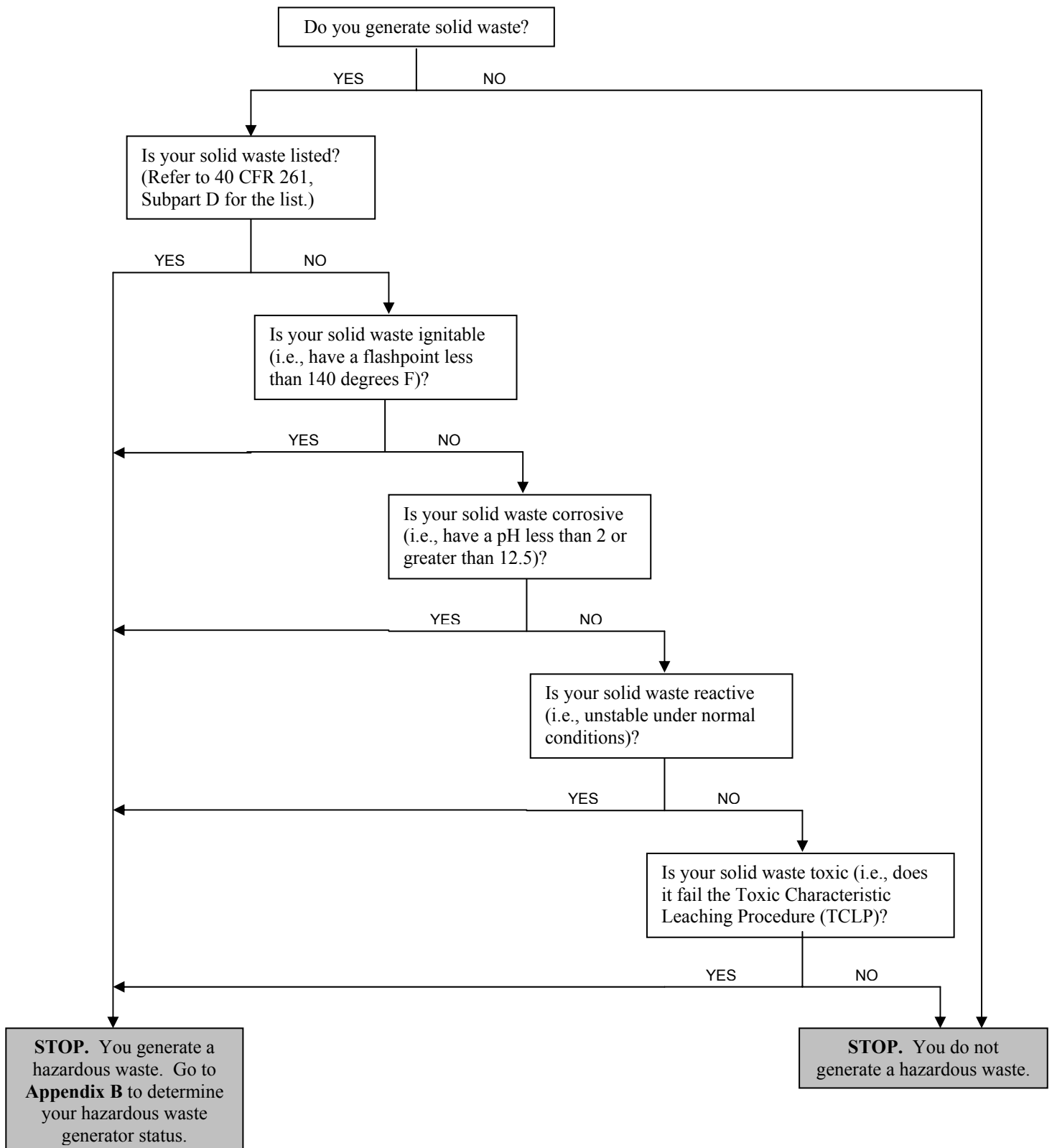
## Appendix A:

### Flowchart: Do You Generate Hazardous Waste?

Complete the flowchart to determine whether you generate hazardous waste. If you do generate hazardous waste, go to **Appendix B** to determine your hazardous waste generator status. (A waste can meet one of the following triggers regarding hazardous waste, but may still be specifically exempted (e.g., used oil, scrap metal or universal waste).)



## Flowchart: Do You Generate Hazardous Waste?





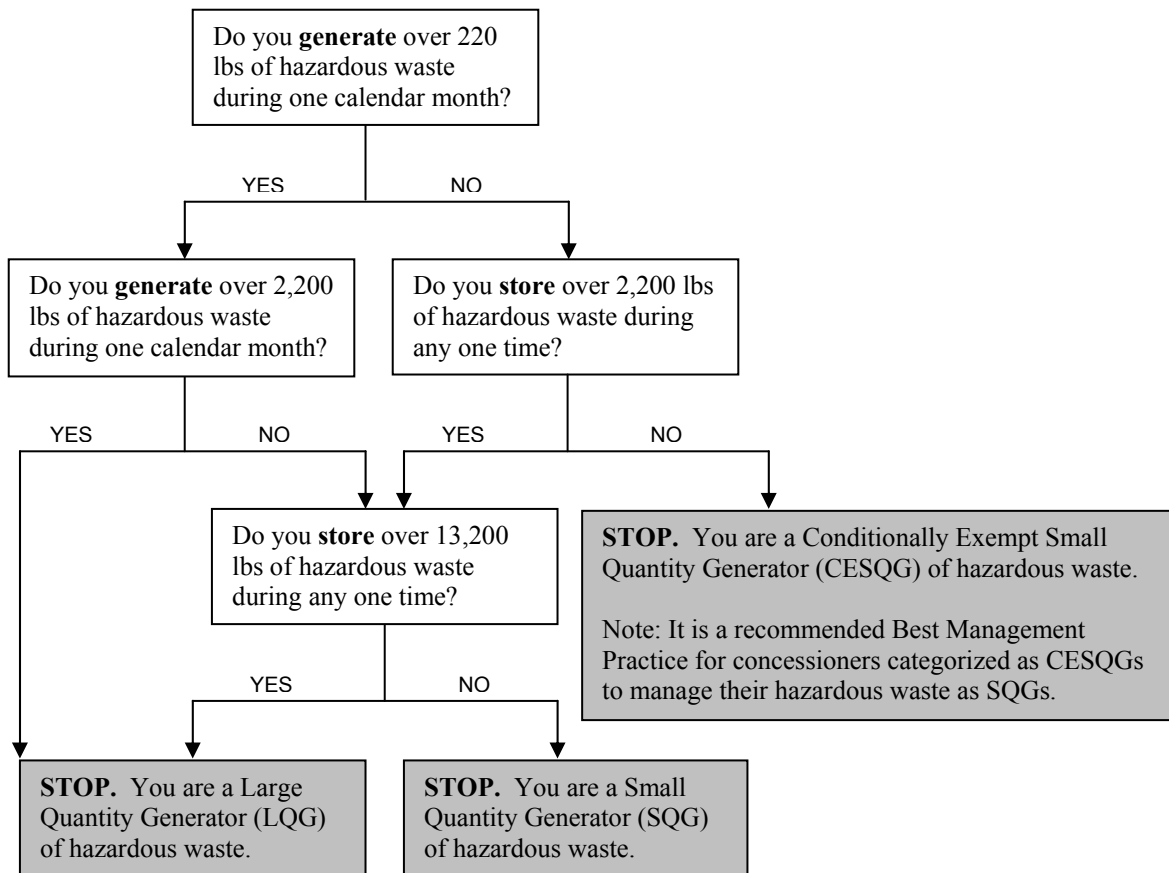
## Appendix B:

### Flowchart: What is Your Hazardous Waste Generator Status?

If you generate hazardous waste (see **Appendix A**), complete this flowchart to determine your hazardous waste generator status. You should pick the one month out of the calendar year during which you generate the largest amount of hazardous waste to determine your hazardous waste generator status.

(It is conceivable that concessioners could alternate between the hazardous waste generator status categories (e.g., from CESQG to SQG to CESQG); however, it is easier to manage hazardous waste under one generator status over an extended period of time than to switch standard operating procedures from month to month. Therefore, in completing this flowchart, the NPS Concession Environmental Management Program recommends that concessioners pick the one month during which they generate the largest amount of hazardous waste to determine their hazardous waste generator status.)

## Flowchart: What is Your Hazardous Waste Generator Status?





## Appendix C:

### Monthly Hazardous Waste Generation and Accumulation Tracking Worksheet

#### DIRECTIONS FOR FILLING OUT WORKSHEET

Using this form or other appropriate tracking mechanisms, the environmental manager, or other authorized concessioner employee, should record each hazardous waste stream generated on a **monthly basis**. Multiple pages can be used each month, if needed.

The concessioner should indicate the source of the hazardous waste, describe the waste and its form (e.g., solid, liquid), list its hazardous waste code and how s/he determined the code (e.g., MSDS or TCLP), and the amount generated during the month.

At the end of each month, determine the total weight of the hazardous waste generated at the facility (i.e., add the second to the last column).

These forms should be kept on file for at least three years to document the concessioner's hazardous waste generator status.

Note: The following are estimates you can use to complete the forms:

- One 55-gallon drum of hazardous waste liquid weighs approximately 440 lbs, although some liquid wastes are heavier than others (e.g., tank sludge versus fuel).
- The total amount of hazardous waste that a CESQG can generate each month is approximately 25 gallons of hazardous waste liquid.

## MONTHLY HAZARDOUS WASTE GENERATION AND ACCUMULATION TRACKING WORKSHEET

Month: \_\_\_\_\_ Year: \_\_\_\_\_ Completed By (Name and Date): \_\_\_\_\_

Source	Chemical Name/ Description of Waste	Waste Type (e.g., liquid, sludge)	Characterization Results/ Source (MSDS <sup>1</sup> or Testing)	Amount Generated This Month (volume or weight)
Engine Maintenance <sup>2</sup>	Spent Solvent	Liquid	Ignitable (F003) <sup>3</sup> – from MSDS	1 gallon

(Circle subtotal or grand total, as appropriate.) SUB/GRAND TOTAL: \_\_\_\_\_

<sup>1</sup> Material Safety Data Sheet. An MSDS is a document that provides detailed information about a chemical, including any hazards associated with the chemical (e.g., flammability, corrosiveness.).

<sup>2</sup> This row is a sample to show how the table should be filled out.

<sup>3</sup> Hazardous waste classification code that is required on all hazardous waste manifests.



## **Appendix D:**

### **Sample Labels**

## Labeling for Hazardous Wastes in a Satellite Accumulation Area

A typical label that may be affixed to a 55-gallon drum of waste solvent from a parts washer in a satellite accumulation area is presented below. Once the 55-gallon threshold for a satellite storage area is reached, the excess waste must be transferred to the hazardous waste storage area within three days. Note that the “Accumulation Start Date (when moved into hazardous waste storage area)” will not be filled out unless the labeled container used in the satellite accumulation area is the same container used to store the waste in the hazardous waste storage area. **(Remember, no more than 55 gallons of hazardous waste can be stored in a satellite accumulation area at any one time.)**

<p style="text-align: center;"><b>HAZARDOUS WASTE</b> <b><i>SPENT SOLVENT PARTS WASHER –</i></b> <b><i>NAPHTHA</i></b></p> <p>Accumulation Start Date (in Satellite Area): <u>10/2/02</u> Date Satellite Container Became Full: <u>11/25/03</u> Responsible Person: <u>Joe Brown, Maintenance Shop</u></p> <p style="text-align: center;"><b>ACCUMULATION START DATE</b> (Date moved into the hazardous waste storage area):  _____</p>
---

## Labeling for Hazardous Waste Containers

A typical label affixed to a tank of spent solvent is presented below.

<p style="text-align: center;"><b>HAZARDOUS WASTE</b> <b><i>SPENT SOLVENT PARTS WASHER -</i></b> <b><i>NAPHTHA</i></b></p> <p>Accumulation Start Date: <u>11/25/02</u> Responsible Person: <u>Joe Brown, Maintenance Shop</u></p>
---



## **Appendix E**

### **Record of Offsite Management of Hazardous Waste**

The concessioner should keep records of any hazardous wastes given to transporters and/or disposal facilities (e.g., receipts). For a CESQG who disposes of its hazardous waste at household hazardous waste collection facilities, it is possible these facilities may not provide the concessioner with documentation indicating that it received the concessioner's hazardous waste and will handle it according to regulations.

In such cases, the concessioner may utilize the following sample form, or can develop a similar internal document for its files, that includes the name and contact information for the transporter and/or disposal facility, the type and amount of hazardous waste given to the transporter and/or disposal facility, and the date it was shipped or dropped off. This form can then serve as a record to demonstrate how the CESQG concessioner manages its hazardous wastes.



## RECORD OF OFF-SITE MANAGEMENT OF HAZARDOUS WASTE

**TO:** [File]

**FROM:** [INSERT NAME OF RESPONSIBLE PARTY]

**DATE:** [INSERT DATE]

**SUBJECT:** Record of Off-Site Management of [INSERT  
CONCESSIONER NAME] Hazardous Waste

---

Hazardous waste generated at this facility is managed in accordance with regulatory requirements stipulated by the State of [INSERT STATE NAME]. The following is intended to serve as a record of the offsite shipment and disposal of hazardous waste from this facility in instances where the transporter and/or disposal facility accepting the waste does not provide [CONCESSIONER] with a receipt.

DATE WASTE SENT:

---

TYPE OF HAZARDOUS WASTE:

---

TRANSPORTER/DISPOSAL FACILITY  
ACCEPTING HAZARDOUS WASTE  
(name, address, phone number)  
:

---

AMOUNT OF HAZARDOUS WASTE SENT  
(IN UNITS OR POUNDS):

---